



**U.S. Department of Justice**

*United States Attorney  
Eastern District of New York*

LHE:GK/JRS/DL  
F. #2018R01401

*271 Cadman Plaza East  
Brooklyn, New York 11201*

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By Email and ECF

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*Counsel for Rachel Cherwitz*

*Counsel for Nicole Daedone*

Re: United States v. Rachel Cherwitz and Nicole Daedone  
Criminal Docket No. 23-146 (DG)

Dear Counsel:

Enclosed please find the government's discovery in accordance with Rule 16 of the Federal Rules of Criminal Procedure. This discovery is being produced to you pursuant to the Protective Order in the above-captioned matter, entered on June 26, 2023. ECF Dkt. No. 26.

The production includes the following materials:

- Records from Wells Fargo (ONETASTE00013267 – ONETASTE00014800);
- Records from PayPal (ONETASTE00014801 – ONETASTE00015067);
- Records from Intuit (ONETASTE00015068 – ONETASTE00015136);
- Records from Gusto (ONETASTE00015137 – ONETASTE00016770);

- Records from Goldman Sachs (ONETASTE00016771 – ONETASTE00018311 and ONETASTE00019008);
- Records from Fidelity (ONETASTE00018312 – ONETASTE00019007);
- Records from Chicago Title (ONETASTE00019009 – ONETASTE00021695); and
- Records from Bank of America (ONETASTE00021696 – ONETASTE00025881).

Please contact DupeCoop at [dupecoop@mac.com](mailto:dupecoop@mac.com) and reference the above-captioned case to obtain a copy of the discovery.

You may examine physical evidence discoverable under Rule 16, including original documents, by calling me to arrange a mutually convenient time.

The government renews its request for reciprocal discovery from the defendants. Please note that the defendants' obligations under Fed. R. Crim. P. 16(b) include identification of "all non-impeachment exhibits [the defendants] intend to use in their defense at trial, whether the exhibits will be introduced through a government witness or a witness called by a Defendant." United States v. Napout, No. 15-CR-252 (PKC), 2017 WL 6375729, at \*7 (E.D.N.Y. Dec. 12, 2017); accord United States v. Smothers, No. 20-CR-213 (KAM), 2023 WL 348870, at \*22 (E.D.N.Y. Jan. 20, 2023).

If you have any questions or requests regarding further discovery or a disposition of this matter, please do not hesitate to contact us.

Very truly yours,

BREON PEACE  
United States Attorney

By: /s/ Lauren H. Elbert  
Lauren H. Elbert  
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Enclosures

cc: Clerk of the Court (DG) (by ECF) (without enclosures)